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18 January 2001

Steve Faryan, On-Scene Coordinator  
United States Environmental Protection Agency  
Emergency Response Branch  
77 West Jackson Boulevard, HSE-5J  
Chicago, Illinois 60604

TDD: S05-0105-004  
DCN: 103-2A-ABFD



Re: Review of Lockformer Health and Safety Plan  
Prepared by Clayton Group Services

Dear Mr. Faryan:

Roy F. WESTON has completed the review of the Health and Safety Plan (HASP) prepared for the Removal Action at the Lockformer Company. Clayton Group Services, Incorporated prepared the HASP. The review comments provided by WESTON do not constitute approval or disapproval of the HASP, but the review comments are provided for U.S. EPA and Clayton's consideration to ensure that the requirement set forth in the 29 CFR 1910 and OSHA requirements are met. The review comments are summarized below.

## **Section 1.0 General Information and Scope of Work**

There is no mention of the hazards of concern (chemical, biological, or physical). The General Information throughout this section only describes the site itself not the hazards.

### **Section 1.1 Scope of work**

For each task identified in the bullet listed item provide a brief description of activities to be performed.

### **Section 1.2 Site Location, History, and Current Conditions**

In Section 1.2, there is no mention of the areas of concern. The reason for the removal action and the treatment of the soil is not presented in the HASP. Provide information for historical site assessments if previously performed. What regulatory actions have been taken by the local, state or federal authorities pertaining to the contamination onsite?





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The HASP does not indicate what is being manufactured at the facility or if the manufacturing facility is still in operation. If the plant is still operational, what are the physical and chemical hazards that need to be considered when working near those areas.

### **Section 1.3.1 Personnel**

The personnel section does not include the specific subcontractors and safety requirements for their respective activities (drillers, well installers, electricians and other required subcontractors).

Office Health and Safety Officer(OHSO) - Will the amendments to the safety plan be approved by the OHSO.

Site Health and Safety Officer (SHSO)- A daily tailgate meeting meeting should be conducted by the SHSO. Does the SHSO have access to the field operation procedures (FOPS). Are the FOPS available for review onsite? Who is responsible for the overall site safety, the OSHO or the project manager?

There is no mention of the alternate SHSO described previously.

### **Section 1.3.2 OSHA Required Training and Medical Surveillance**

There is no mention regarding Blood borne Pathogens (BBP) training requirements.

### **Section 1.4 General Guidelines**

Under General Guidelines, there is no mention of the "buddy system" when conducting site activities. No personnel should be in the exclusion zone alone. The site should have a site entry and exit log to determine who is onsite at anytime and an exclusion zone entry and exit log in case of an emergency egress allowing determination of who is in the exclusion zone.

The heat and cold stresses need to reference each table.

There is no reference to alternative controls such as engineering controls and administrative controls. OSHA requires that alternative controls should be considered prior to using PPE.

There is no reference to record keeping and incidence information logs and required documentation for the site (OSHA 300 Logs)

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## **Section 2.0 Hazardous Evaluation**

The hazardous evaluations risk assessment for each task is not broken down into chemical, physical, or biological categories. The level of risk is not evaluated in the safety plan. The type of hazard for the site is not specified in the plan (physiochemical, chemical toxicity, and biological).

### **Section 2.6.1 Electrical Voltage**

For electrical systems more than 600 volts, installations in a vault room, closet or in an area surrounded by a wall, screen, or fence, access to which is controlled by lock or key or other approved means are considered to be accessible to qualified personnel only (29CFR 1910.303(h)(2) 1997). A wall, screen or fence less than 8 feet in height is not considered to prevent access unless it has other features that provide a degree of isolation equivalent to an 8-foot fence.

Will all the heating elements rated at more than one ampere be properly marked? (29CFR 1910.303 (e). Does the ground near other facilities have the potential of heating or conducting a current in the area affecting the nearby facilities?

### **Section 2.7.1 Lockout/Tagout Procedures**

When tag-out systems are used, are employees trained in the following limitations of tags? [(29 CFR 1910.147 (c)(7)(ii)(A-F), 1997)]

- Tags are warning devices that do not provide physical restraint
- Tags are not to be removed without authorization, or bypassed or ignored or otherwise defeated.
- Tags must be legible and understandable
- Tags must be substantial enough to withstand the environmental conditions encountered.
- Tags may invoke a false sense of security and their meaning needs to be understood.
- Tags must be securely attached to energy isolating devices.
- Are live parts of electrical operating at 50 volts or greater guarded against accidental contact [29CFR 1910.303(g)(2)(i)(A-D)].

## **Section 3.1 Monitoring Frequency**

Check the photoionization potential for the chemicals of concern. If the energy level is above 10.2 eV, the instrument may not detect the correct levels for that specific chemical compound.





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### **Section 3.2 Action Levels**

For the action levels, the note underneath the table indicated that this information was obtained from NIOSH Pocket Guide to Chemical Hazards. The information was not found in the NIOSH handbook. How were the action levels determined? For Vinyl Chloride the action level will be five times to work in LEVEL C because the PEL/TWA for Vinyl Chloride is one part per million.

### **Section 4.2 Safety Zones and Access Controls**

The HASP had no indication that an exclusion zone entry and exit log was being generated for each day of site activities.

### **Section 4.3 Personal Protective Equipment.**

Depending on the concentration of the contaminants, neoprene gloves may not be the right gloves. When using neoprene as outer gloves, the breakthroughs times are approximately 20 to 30 minutes per chemical and it is unknown for vinyl chloride.

MSA had determined that vinyl chloride is a chemical compound that they list as compounds where level C cartridges should not be used. Check manufacturers for an updated list of chemical compounds that would not be appropriate for cartridge use.

### **Section 4.4 Additional Emergency and Safety Equipment**

In this section, the HASP indicated that only one fire extinguisher will be used. If several activities are occurring at the same time, more than one fire extinguisher maybe required and the information of the annual and monthly inspection of the fire extinguisher needs to be documented.

### **Section 5.0 Contingency and Emergency Procedures**

The route to the hospital should contain the exact distance and the estimated time to drive from the site to the hospital.

### **Section 5.2 Fire and Explosion**

Due to potential for a fire and explosion, an emergency egress plan needs to be documented to determine the location where everyone needs to meet, if an emergency occurs onsite. An emergency horn signal or alarm system needs to be implemented to notify everyone onsite of an emergency. Once the alarm/horn is activated, everyone onsite should meet at a predetermined area outside the site.



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This is where the local authorities (police or fire departments) will also meet.

### **Section 5.5 List of Emergency Telephone Numbers**


The list does not include the number for the state emergency response (IEPA). Are additional contractors going to be onsite. If the contractor is not determined, indicate what the responsibilities will be, a.k.a. drillers, and for the number put "To Be Determined."

If you have any questions, please call me at (847) 918-4051.

Very truly yours,

ROY F. WESTON, Inc.

  
for  
Ron Bugg  
Safety Officer

  
Omprakash S. Patel  
Senior Project Manager